KORSEY SMITH & BESSIE SMITH P. O. BOX 450318 HOUSTON, TEXAS 77245 281 - 431 - 2300

April 12, 2002

United States Courts
Southern District of Texas
FILED

APR 1 2 2002

Michael N. Milby, Clerk United States District Court Southern District of Texas 515 Rusk Avenue Houston, Texas 77002

Michael N. Milby, Clark

Re:

Civil Action No. H-02-0495; Gary Gates, et al. v. Texas Department of Protective and Regulatory Services, et al.; In the United States District Court, Southern District of Texas, Houston, Division.

Dear Mr. Milby:

Enclosed you will find an original and two (2) copies of the following document for filing concerning the above mentioned case: reply to allegations against Respondent Korsey Smith and Respondent Bessie Smith, foster parents for Texas Department of Protective and Regulatory Services.

Please file stamp one (1) copy for the court record, and return two (2) copies marked "filed" to us in the self-addressed postage paid envelop provided for your convenience.

Thank you kindly for your consideration in this matter.

Respectfully,

prsell

Korsey Smith / Bessie Smith

Enclosures: via hand delivered

Copy: All known parties of record.

William G. Harger
Hoover & Harger
12046 Daim Ashford Suite 26

12946 Dairy Ashford, Suite 200 Sugar Land, Texas 77478 by certified mail return receipt requested

45

Hon, Michael N. Milby April 12, 2002 page 1

Cc:

Ben W. "Bud" Childers County Attorney Fort Bend County, Texas 301 Jackson St., Suite 621 Richmond, Texas 77469-3108

by certified mail, return receipt requested

Christopher B. Gilbert
Bracewell & Patterson
711 Louisiana Street, Suite 2900
Houston, Texas 77002-2781

by certified mail, return receipt requested

Kelly M. Keller Vinson & Elkins, L.L.P. 2300 First City Tower 1001 Fannin Street Houston, Texas 77002-6760

by certified mail, return receipt requested

William G. Harger 12946 Dairy Ashford, Suite 200 Sugar Land, Texas 77478 by certified mail, return receipt requested

Texas Department of Protective and Regulatory Services Thomas Chapmond, Executive Director 701 West 51st. Street Austin, Texas 78751

by certified mail, return receipt requested

Karen Sheehan 1110 Avenue G Rosenberg, Texas 77471

by certified mail, return receipt requested

Jerry Polasek 1110 Avenue G Rosenberg, Texas 77471

by certified mail, return receipt requested

Amy Odin 1110 Avenue G Rosenberg, Texas 77471

by certified mail, return receipt requested

Hon. Michael N. Milby April 12, 2002 Page 2

Cc: Sandra Russell 1110 Avenue G Rosenberg, Texas 77471

by certified mail, retuen receipt requested

Lisa Matthews 1110 Avenue G Roseberg, Texas 77471

by certified mail, return receipt requested

Laurel Miller 1110 Avenue G Rosenberg, Texas 77471

by certified mail, return receipt requested

Brika David 1110 Avenue G Rosenberg, Texas 77471

by certified mail, return receipt requested

Sherrece Haywood 1110 Avenue G Rosenberg, Texas 77471

by certified mail, return receipt requested

Laura Ramirez 1110 Avenue G Rosenberg, Texas 77471

by certified mail, return receipt requested

Milton Wright
Fort Bend County Sheriff's Department
1410 Random Road
Richmond, Texas 77469

by certified mail, return receipt requested

Sam Millsap Fort Bend County Sheriff's Department 1410 Random Road Richmond, Texas 77469

by certified mail, return receipt requested

Hon. Michael N. Milby April 12, 2002 page 3

Cc: Arthur Chapman

Fort Bend County Sheriff's Department

1410 Random Road Richmond, Texas 77469 by certified mail, return receipt requested

Carlos Carrillo

Fort Bend County Sheriff's Department

1410 Random Road Richmond, Texas 77469 by certified mail, return receipt requested

Virginia Schafer

Fort Bend County Sheriff's Department

1410 Random Road

Richmond, Texas 77469

by certified mail, return receipt requested

Ken Lee

Fort Bend County Sheriff's Department

1410 Random Road

Richmond, Texas 77469

by certified mail, return receipt requested

Scott Pagel

Fort Bend County Sheriff's Department

1410 Random Road

Richmond, Texas 77469

by certified mail, return receipt requested

John F. Healy, Jr.

Fort Bend County District Attorney's Office

301 Jackson Street

by certified mail,

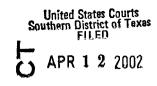
Richmond, Texas 77469

return receipt requested

Kathryn Holton

Fort Bend County District Attorney's Office

301 Jackson Street Richmond, Texas 77469 by certified mail, return receipt requested



IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

Michael N. Milby, Clerk

GARY GATES, et al., Plaintiffs,

CIVIL ACTION NO. H-02-0495

vs.

TEXAS DEPARTMENT OF PROTECTIVE AND REGULATORY SERVICES, et al., Defendants.

TO THE HONORABLE JUDGE OF SAID COURT:

Respondent Korsey Smith deny each and every allegations in the original petition

Respondent Bessie Smith deny each and every allegations in the original petition.

Respectfully Submitted,

Korsey/smith

Bessie Smith

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to all parties listed below by U. S. First-Class Mail, on this 15th day of April, 2002:

William G. Harger 12946 Dairy ashford, Suite 200 Sugar Land, Texas 77478

Fort Bend County Sheriff's Dept. Sheriff Milton Wright 1410 Ransom Road Richmond, Texas 77469

Lisa Matthews 1110 Avenue G Rosenberg, Texas 77471

Laurel Miller 1110 Avenue G Rosenberg, Texas 77471

Sherrece Haywood 1110 Avenue G Rosenberg, Texas 77471

Scott Pagel 1410 Ransom Road Richmond, Texas 77469

Ken Lee 1410 Ransom Road Richmond, Texas 77469

Marsha Vogelsang 3911 Avenue I Rosenberg, Texas 77471

Virginia Schafer 1410 Ransom Road Richmond, Texas 77469

Karen Kleine 3911 Avenue I Rosenberg, Texas 77471 Thomas Chapmond 701 West 51st Street Austin, Texas 78751

Texas Dept. of Protective & Regulatory Service
Thomas Chapmond, Executive
Director
701 West 51st Street
Austin, Texas 78751

Brika Davis 1110 Avenue G Rosenberg, Texas 77471

Karen Sheehan 1110 Avenue G Rosenberg, Texas 77471

Amy Odin 1110 Avenue G Rosenberg, Texas 77471

Sandra Russell 1110 Avenue G Rosenberg, Texas 77471

Honorable James C. Adolphus Judge, Fort Bend County 309 South 4th Street Richmond, Texas 77469

John F. Healey, Jr. 301 Jackson Street Richmond, Texas 77469

Fort Bend County District Attorney's Office 301 Jackson Street Richmond, Texa

Cynthia Brown 3911 Avenue I Rosenberg, Texas 77471 Milton Wright 1410 Ransom Road Richmond, Texas 77469

Arthur Chapman 1410 Ransom Road Richmond, Texas 77469

Sam Millsap 1410 Ransom Road Richmond, Texas 77469

Carlos Carrillo 1410 Ransom Road Richmond, Texas 77469 Kathryn M. Holton 301 Jackson Street Richmond, Texas 77469

Judy O'Neal 7110 Greatwood Parkway Sugar Land, Texas 77479

Jerry Polaske 1410 Ransom Road Richmond, Texas 77469

Laura Ramirez 1410 Ransom Road Richmond, Texas 77569

Korsey Smith, Jr.

Bessie Smith